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20 RASIER, LLC, and RASIER-CA, LLC

21 *[Additional Counsel Listed on Following Pages]*

22 IN RE: UBER TECHNOLOGIES, INC.,
23 PASSENGER SEXUAL ASSAULT
24 LITIGATION,

25 This Document Relates to:

26 *Jaylynn Dean v. Uber Technologies, Inc., et*
al., No. 3:23-cv-06708

27 Case No. 3:23-md-03084-CRB

28 **DECLARATION OF MARIANA
ESTEVES IN SUPPORT OF
DEFENDANTS' MOTION FOR
PARTIAL SUMMARY JUDGMENT**

Judge: Hon. Charles R. Breyer
Courtroom: Courtroom 6 – 17th Floor

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DECLARATION OF MARIANA ESTEVES

I, Mariana Esteves, declare as follows:

1. I am over the age of 18 years and a citizen and resident of Brazil. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein. I submit this declaration in support of Defendants Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC's (collectively, "Uber") Motion for Partial Summary Judgment.

2. I am currently employed by Uber Technologies, Inc. as a Group Product Manager of Safety Features. I have been employed by Uber from 2019 to the present. My roles during that time have included Lead Project Manager of Safety Features and Safety Project Manager of Safety Features.

3. The Uber App provides a suite of real-time, responsive safety features that Uber continuously enhances over time.

4. As part of every trip, Uber collects and stores GPS data, which it uses in internal investigations of misconduct allegations and to assist law enforcement with related criminal investigations.

5. In September 2019, Uber released a safety feature called “RideCheck,” which analyzes GPS data in real time to detect unexpectedly long stops and possible car crashes. If such a stop is detected, the Uber App proactively reaches out to the rider and the driver to confirm that neither has any concerns about the trip.

6. In 2020, Uber enhanced the “RideCheck” real-time detection technology to include detection of trips that end prior to arrival at the rider’s requested destination (mid-way dropoffs). In 2021, Uber added detection of unexpected route deviations. The vast majority of the time that RideCheck is triggered, there is no associated safety incident.

7. In 2021, Uber released In-App Audio Recording, a safety technology which allows a rider or driver to record audio during a trip and send the audio directly to Uber so the company

1 can review and take any appropriate action.

2 8. In September 2023, a competing rideshare platform, Lyft, offered a Gender Match
3 feature (“Women+ Connect”) in certain markets.

4 9. Uber has been exploring the possibility of allowing women riders to set a
5 preference to be matched with women drivers, and vice versa. In July 2025, Uber launched a pilot
6 of its Women Preferences Option in San Francisco, Los Angeles, and Detroit to test and optimize
7 the feature.

8 10. Uber does not ordinarily collect gender information from riders when they create
9 an account.

10 11. Offering a Gender Match feature that would permit female riders the option of
11 matching exclusively with female drivers (“Gender Match”) requires the implementation of a
12 machine learning algorithm (a “Gender Inference Framework”) designed to infer the gender of
13 riders and drivers using names and other information.

14 12. Any Gender Match feature also depends on Uber’s verification services to ensure
15 drivers or riders do not misrepresent their gender to gain access to the program.

16 13. Implementing a Gender Match feature also raises other serious challenges, such as
17 complex issues related to the spectrum of gender identities, including how to account for
18 transgender or non-binary individuals, and risks relating to allegations of discrimination.

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1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed on the 10th of November, 2025.
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5 *Mariana Esteves*
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